

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In Re: BRIDGESTONE/FIRESTONE, INC., TIRES PRODUCTS LIABILITY ACTION)	Master File No. IP 00-9374-C-B/S
)	MDL No. 1373
)	(centralized before Hon. Sarah
)	Evans Barker, Judge)
)	
SHAWN LLOYD, et. al.,)	
Plaintiffs,)	1:09-cv-5850-SEB-JMS
v.)	
BRIDGESTONE FIRESTONE NORTH AMERICAN TIRE, LLC, et. al.)	
Defendants.)	
)	
SHAWN LLOYD, et. al.,)	1:09-CV-5851-SEB-JMS
Plaintiffs,)	
v.)	
FORD MOTOR COMPANY, et. al.)	
Defendants.)	
)	

PETITION FOR APPROVAL OF SETTLEMENT

Plaintiff Shawn Lloyd, individually and as Administrator of the Estate of QUIYANA M. PIERCE-LLOYD, deceased, by and through her respective counsel, hereby files this Petition for Approval of the Estate's settlement with all parties. In support of the Motion, counsel for Plaintiff states as follows:

1. On or about September 3, 2006, Quiyana Lloyd sustained fatal injuries when the vehicle she was passenger in lost control and rolled as a result of a tire tread separation. At the time of this accident, the subject vehicle was being operated by Charvon Davis-Pierce. .

2. Following this accident, Shawn Lloyd retained Newsome Law Firm to prosecute products liability and negligence claims against Bridgestone Firestone North America, Newins Bayshore Ford, Charvon Davis-Pierce, Ford motor Company and Constance Davis,.

3 Plaintiff Shawn Lloyd, individually and as Administrator of the Estate of QUIYANA M. PIERCE-LLOYD, deceased, resolved all claims of the estate with all parties at the settlement conference held on December 9, 2009. Additionally, the survivors of the estate agreed to divide the net settlement proceeds to the estate as follows:

90% to Shawn Lloyd, biological mother of Quiyana Pierce-Lloyd; and

10% to Nicholas Pierce, biological father of Quiyana Pierce-Lloyd.

4. The settlement amounts are confidential by agreement of the parties, but are known to the Court, as Judge Magnus-Stinson presided over the settlement conference.

5. Virginia Code 8.01-425, the controlling law for this estate, allows approval of settlements to be done by a court of “competent jurisdiction”. On December 11, 2009, Plaintiff’s counsel advised all parties that it would seek approval from Judge Magnus-Stinson for the settlement on behalf of the estate. No objections were made or received.

WHEREFORE, SHAWN LLOYD et. al., hereby respectfully request the Court enter an Order as follows:

A. Authorizing SHAWN LLOYD, individually and as Administrator of the Estate of

QUIYANA M. PIERCE-LLOYD, deceased, to enter into the settlement agreement with all parties;

- B. Authorizing SHAWN LLOYD to execute any documents necessary to complete the settlements with all parties; and
- C. Approving the split of net estate proceeds as follows:

90% to Shawn Lloyd, biological mother of Quiyana Pierce-Lloyd; and

10% to Nicholas Pierce, biological father of Quiyana Pierce-Lloyd.

I HEREBY CERTIFY that on this 7th day of January, 2010, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing a copy of the foregoing to:

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Respectfully submitted,

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